

United States Courts  
Southern District of Texas  
FILED

SEP 13 2014

David J. Bradley, Clerk of Court

A091 (Rev. 8/01) Criminal Complaint

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA  
V.  
**Danny Daniel LINARES-Hernandez**  
**Eduardo ORTIZ-Robles**  
**Adlic ANGEL-Ramirez**  
**Rodolfo HERNANDEZ-Morales**  
**Abel ANGEL-Ramirez**

**CRIMINAL COMPLAINT**

Case Number: **C - 14 - 985m**

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about September 12, 2014 in Brooks County, in the  
(Date)

Southern District of Texas defendants, **Danny Daniel LINAREZ-Hernandez,**  
**Eduardo ORTIZ-Robles, Adlic ANGEL-Ramirez, Rodolfo HERNANDEZ-Morales; Abel ANGEL-Ramirez**

and did knowingly and intentionally conspire to possess with intend to distribute a Schedule I Controlled Substances; to wit **MARIJUANA**

in violation of Title 21 United States Code, Section(s) 841 & 846  
I further state that I am a(n) Special Agent and that this complaint is based on the  
following facts: Official Title

See Attached Affidavit of ICE Special Agent **Casandra Anderson**

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Casandra Anderson  
Signature of Complainant

**Casandra Anderson**  
Printed Name of Complainant

Sworn to before me and signed in my presence, and probable cause found on

September 13, 2014  
Date

Jason B. Libby U.S. Magistrate Judge  
Name and Title of Judicial Officer

at

Corpus Christi, Texas  
City and State  
[Signature]  
Signature of Judicial Officer

**AFFIDAVIT**

On September 12, 2014, at approximately 1:00 a.m., the Office of Border Patrol (OBP) air surveillance unit informed OBP agents that the surveillance unit had a visual of a vehicle that was dropping off several subjects that appeared to be carrying large bundles on their backs into the brush near the intersection of Farm to Market Road 755 and County Road 315. The OBP air surveillance unit advised OBP ground units of the location where he had observed the subjects, and with the assistance of a National Guard helicopter were able to apprehend six (6) subjects, which includes a juvenile, all determined to be illegally present in the United States, in the brush with seven (7) bundles of marijuana weighing approximately two hundred and seventeen point zero four (217.04) kilograms.

Rodolfo HERNANDEZ-Morales stated he is a citizen of Mexico illegally present in the United States. HERNANDEZ related that while in Mexico he agreed to carry a backpack composed of marijuana with him in the United States in order to waive his smuggling fee into the United States. HERNANDEZ stated upon crossing into the United States he arrived at a truck that contained the marijuana. HERNANDEZ explained there was a driver already in the vehicle, but a total of ten (10) undocumented aliens were in the group, to include himself, and there was a total of seven (7) backpacks composed of marijuana to carry. HERNANDEZ said the vehicle drove for approximately thirty (30) minutes and they were dropped off in the brush and rested there with the marijuana for a day. HERNANDEZ explained a sports utility vehicle came to pick the group and the marijuana up, the vehicle drove for thirty (30) minutes and they were then dropped off in the brush. HERNANDEZ stated he was carrying a backpack composed of marijuana when the OBP approached them. HERNANDEZ related four (4) subjects absconded, however those who he was apprehended with were all carrying the backpacks composed of marijuana.

Eduardo ORTIZ-Robles stated he is a citizen of Mexico illegally present in the United States. ORTIZ related he paid one thousand dollars (\$1,000.00) in Mexico to be smuggled into the United States and was told he could pay the remaining fee of two thousand and eight hundred dollars (\$2,800.00) to be taken to Houston, Texas or he could carry the backpack containing marijuana and not be charged anything further. ORTIZ stated he agreed to carrying the marijuana. ORTIZ related he was picked up in a sports utility vehicle after entering the United States from Mexico and the vehicle drove a short period and dropped the group off in the brush with the backpacks composed of marijuana. ORTIZ related they were picked up by a truck and then dropped off in the brush again. ORTIZ said when the OBP approached them four (4) subjects absconded.

Abel ANGEL-Ramirez stated he is a citizen of Mexico illegally present in the United States. ANGEL related after crossing with a group of eight (8) or nine (9) people from Mexico into the United States, they walked a short period to a truck. ANGEL stated they got into the truck and after a twenty (20) minute ride were dropped off in the brush. ANGEL related at this point he was carrying a backpack composed to marijuana. ANGEL said a white truck arrived and he assisted in loading the marijuana into the truck and he and the others got into the cab of the truck. ANGEL related the drove for thirty (30) minutes and they were dropped off in the brush with the marijuana and they waited there. ANGEL said a similar white truck arrived and once again the bundles were put in the back of the truck and the group was put into the cabin of the truck. ANGEL related the truck drove for a short time and then they were dropped off in the brush and the OBP then arrived. ANGEL explained his brother, Adlic ANGEL-Ramirez, made the smuggling arrangements however he believed that if they were to help move the marijuana they would receive a discount on their smuggling fee.

Adlic ANGEL-Ramirez stated he is a citizen of Mexico illegally present in the United States. ANGEL related after crossing with a group of ten (10) people from Mexico into the United States they got into a truck that already contained the marijuana. ANGEL stated they got into the truck and after thirty (30) minutes were dropped off in the brush where they waited for a day. ANGEL said there were more subjects than backpacks composed of marijuana. ANGEL related a similar in color truck arrived and he assisted in loading the marijuana into the truck and all the subjects got into the truck. ANGEL stated the truck drove for thirty (30) minutes and they were dropped off in the brush with the marijuana. ANGEL related the OBP agents arrived and four (4) subjects absconded. ANGEL explained he was offered a discount for his smuggling fee if he were to carry the marijuana.

Danny David LINARES-HERANDEZ stated he is a citizen of Guatemala illegally present in the United States. LINARES related he was going to pay a total of six thousand dollars (\$6,000.00) to be smuggled into the United States. LINARES said he paid three thousand six hundred (\$3,600.00) for his trip from Guatemala to Mexico and paid one thousand dollars (\$1,000.00) before crossing from Mexico into the United States. LINARES explained after crossing the river from Mexico into the United States he was guided to a sports utility vehicle and in the back of the vehicle was the backpacks composed of marijuana. LINARES stated the group got into the vehicle and the vehicle drove for thirty (30) minutes. LINARES related they exited the vehicle and the marijuana was taken out and they waited there for a day. LINARES stated a white pickup truck arrived and he assisted in loading a bundle, which he knew to be marijuana, and the group got into the vehicle and the vehicle drove for forty (40) minutes. LINARES explained they got out of the truck and he was handed a backpack composed with marijuana and began walking with it and that is when the OBP approached the group.



Casandra V. Anderson  
Special Agent  
Homeland Security Investigations (HSI)

SWORN TO AND SUBSCRIBED BEFORE ME this 13th day of September 2014



Jason B. Libby  
United States Magistrate Judge